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Supreme Court, U.S.
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No. 95-1551

In The

Supreme Court of the United States

October Term, 1995

JAMES A. HINCHLIFFE; YONG SUN HINCHLIFFE,

Petitioners,

vs.

FEDERAL HOME LOAN MORTGAGE CORPORATION; TRANSAMERICA CONSUMER DISCOUNT CO.,

Respondents.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Third Circuit

BRIEF IN OPPOSITION FOR RESPONDENT GE CAPITAL MORTGAGE SERVICES, INC.

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QUESTIONS PRESENTED

1. Have the *pro se* Petitioners presented any reviewable question?

2. Have the *pro se* Petitioners presented any question that was raised below or involved in the decision of the Court below?

3. Did the United States Court of Appeals for the Third Circuit err in affirming the decision of the United States District Court for the Eastern District of Pennsylvania in determining that there was no need to remand the appeal to the United States Bankruptcy Court for the Eastern District of Pennsylvania for the purpose of making a factual record with respect to the Petitioners' contentions, where, even if the Petitioners' factual contentions were accepted, the Court of Appeals, the District Court and the Bankruptcy Court correctly determined that no violation of the automatic stay of 11 U.S.C. § 362(a) or contempt could have occurred because the Bankruptcy Court had expressly granted Respondent, GE Capital Mortgage Services, Inc. relief from the automatic stay to proceed with a foreclosure on the Petitioners' residence?

LIST OF PARTIES

Petitioners are James A. Hinchliffe and Yong Sun Hinchliffe, individuals ("Petitioners"). Respondent is GE Capital Mortgage Services, Inc. ("GE"). GE is the successor by assignment to the Federal Home Loan Mortgage Corporation and has been actively participating in these proceedings since they began in the Bankruptcy Court. As the District Court stated in its Memorandum/Order of June 28, 1995, which decision was affirmed by the Court of Appeals, "the true appellee [in this appeal from the Bankruptcy Court] would appear to be GE Capital Mortgage Services, Inc." (Pet. App. B). Transamerica Consumer Discount Company is not participating.

LIST OF ALL PARENT COMPANIES AND NONWHOLLY OWNED SUBSIDIARIES OF GE

Pursuant to S. Ct. R. 29.6, GE submits the following List of Parent Companies and Nonwholly Owned Subsidiaries with which it is affiliated:

General Electric Company

G.E. Aircraft Engines, Cincinnati, OH
Marine & Industrial Engines & Service Div., Cincinnati, OH

G.E. Appliances, Louisville, KY
ROPER Corporation, La Fayette, GA
ROPER Corporation, Chattanooga, TN

G.E. Capital Fleet Services, Fort Wayne, IN

G.E. Capital Fleet Services, Eden Prairie, MN

G.E. Information Services, New York, NY
General Electric Information Systems Co. (GEISCO), Rockville

G.E. Electric Distribution & Control Manufacturing, Plainville

G.E. Industrial Power Systems, Schenectady, NY
G.E. Industrial & Power Systems Sales, Fairfield, CT
G.E. Nuclear Energy, San Jose, CA
G.E. Power Delivery Division, King of Prussia, PA
G.E.-Hitachi HVB Inc., Norcross, GA
Bayou Cogeneration, Pasadena, TX

G.E. Lighting Division, Cleveland, OH
G.E. Toshiba Lighting Corporation, Cleveland, OH

G.E. Medical Systems, Milwaukee, WI

G.E. Plastics, Pittsfield, MA
G.E. Specialty Chemicals, Parkersburg, WV
Cos-Mar, Carville, LA
G.E. Plastics-America, Pittsfield, MA
Plastics Manufacturing Div., Mount Vernon, IN
Plastic Sales Div., Pittsfield, MA
G.E. Silicones, Waterford, NY

G.E. Trading Company, New York, NY
G.E./Fanuc Automation North America, Charlottesville, VA

G.E. Transportation Systems, Erie, PA

General Electric Capital Services, Inc., Stamford, CT
Decimus Corp., San Francisco, CA
Employers Reinsurance Corp., Overland Park, KS
G.E. Capital Commercial Real Estate Financing, Stamford, CT
G.E. Capital Fleet Services, Eden Prairie, MN
G.E. Capital Modular Face, Devon, PA
G.E. Capital McCullagh, Farmingdale, NY
Gelco Travel Services, Inc., Eden Prairie, MN

Creative Media, Devon, PA
Gelco CTI Container Services, Inc., Eden Prairie, MN
Gelco Fleet Mngmt., Eden Prairie, MN
Gelco International Corp., Eden Prairie, MN
Gelco Space, Bala Cynwyd, PA
G.E. Capital TIP Transport International Pool, Devon, PA
G.E. Capital Vendor Financial Services, Danbury, CT
EKCC, Rochester, NY
General Electric Capital Railcar Services, Chicago, IL
General Electric Railcar Repair Services Corp., Chicago, IL
Kidder, Peabody, New York, NY
General Electric Capital Aviation Services, San Francisco, CA

G.E. Environmental Systems, Lebanon, PA
National Broadcasting Co., Inc., New York, NY
CNBC, Fort Lee, NJ

Patrick Media Group, Inc., Chicago, IL

United Pacific Life Insurance Company, Seattle, WA
United Pacific Life Insurance Company, Philadelphia, PA

B. Grimm, Bangkok, Thailand

Fuji/GE PTE Ltd., Singapore, Singapore

G.E. Asia, Singapore, Singapore

G.E. CGR S.A., Issy-les-Moulineaux, Cedex, France

G.E. Technical Services, Singapore, Singapore

G.E. Plastics Europe, Bergen-op-Zoom, Netherlands

G.E. Plastics Pacific Ltd., Singapore 0718, Singapore

General Electric Canada Inc., Mississauga, ON Canada
- G.E. Canada, Peterborough, Peterborough, ON Canada
- G.E. Canada Power Systems, Lachine, PQ Canada
- Dominion Engineering Works, Lachine, PQ Canada
- Camco Inc., Mississauga, ON Canada
  - Camco Inc., Montreal, PQ Canada
- G.E. Fanuc Automation Canada, Mississauga, ON Canada
  - G.E. Plastic Canada, Mississauga, ON Canada
- G.E. Tungstram Co., Vaciut Hungary

G.E. Lighting Europe, London United Kingdom

G.E. Lighting Ltd., Enfield, Middlesex United Kingdom
- Elgar Phosphors & Chemicals Ltd., Enfield, Middlesex

United Kingdom
G.E. Lighting Limited, Mitcham, Surrey United Kingdom

G.E.-Thorn Lamps Presscaps Division, Enfield, Middlesex

United Kingdom
G.E. Lighting (Ireland) Ltd., Dublin, Ireland

General Electric de Mexico, S.A. de C.V., Mexico, D.F. Mexico

General Electric do Brazil, S.A., Sao Paulo S.P. Brazil

General Electric International Operations, London, United Kingdom

Transport International Pool of Canada Limited, Mississauga, ON
Electric Component of PTE Ltd., Singapore, Singapore
GE Medical Systems Asia Ltd., Tokyo, Japan
G.E. (U.S.A.) Aviation Service Operation Pte. Ltd., Singapore
General Electric (USA) Aviation Service Operation Pte. Ltd.
General Electric (USA) Consumer Electronics (Pte) Ltd., Singapore
General Electric (USA) Hermetic Motor Operation (Pte) Ltd.

General Electric Philippines Inc., Metro Manila, Philippines

General Electric Plastics GmbH, Russelsheim, Germany

General Electric (USA) Asia Co., Singapore, Singapore

General Electric (USA) China Company, Ltd., Hong Kong, Hong Kong

Saudi American General Electric, Riyadh, Saudi Arabia

Of the affiliates listed above, General Electric Capital Services, Inc. is the parent of GE.

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OPINIONS BELOW

On January 2, 1996, the United States Court of Appeals for the Third Circuit (the "Court of Appeals") entered a Judgment Order (Pet. App. at A)[1] affirming the June 28, 1995, Memorandum/Order of the United States District Court for the Eastern District of Pennsylvania (the "District Court"). The District Court's Memorandum/Order (Pet. App. at B) affirmed the April 19, 1994, Order of the United States Bankruptcy Court for the Eastern District of Pennsylvania (the "Bankruptcy Court"). On February 2, 1996, the Court of Appeals entered an order (Pet. App. at C) denying the Petitioners' request for a rehearing. On February 26, 1996, the Court of Appeals entered an order (Pet. App. at D) granting Petitioners' request for a stay of the issuance of certified judgment in lieu of formal mandate. The stay expired on March 11, 1996.

STATEMENT OF JURISDICTION

The Petitioners invoke the Court's jurisdiction pursuant to 28 U.S.C. § 1254(1).

STATEMENT OF THE CASE

This is the third frivolous *pro se* appeal filed by these Petitioners in response to a legal and valid residential mortgage foreclosure proceeding brought by GE against the Petitioners in Pennsylvania state court in an effort to collect a $152,750 debt. The petition raises no reviewable questions. It attempts to present questions that were not raised below and that were not involved in the lower court's decision. The case involves the

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1. References to the Petition for Writ of Certiorari are abbreviated as "Pet. ___". References to the Appendix to the Petition are abbreviated as "Pet. App. ___".

routine application of well-settled principles of bankruptcy law and procedure and was correctly decided by the courts below.

A. Factual Background

Petitioners signed on August 12, 1988, a Note and Mortgage in the amount of $152,750 securing certain real estate located at 3 Molly Lane, Chadds Ford, Delaware County, Pennsylvania 19317, their residence (the "Real Property").[2]

After Petitioners had failed to make payments under the Note and Mortgage, GE, on November 1, 1990, by its predecessor in interest, Travelers Mortgage Services, Inc., servicer for the Federal Home Loan Mortgage Corporation, the assignor of GE, filed a Complaint in Mortgage Foreclosure against the Petitioners in Pennsylvania state court (the "Foreclosure Action").

On December 19, 1990, Petitioners' filed a voluntary petition for relief in the Bankruptcy Court under Chapter 11 of the United States Bankruptcy Code thereby staying the Foreclosure Action.

In June 1991, GE filed a motion in the Bankruptcy Court seeking relief from the automatic stay of 11 U.S.C. § 362(a) to proceed with the Foreclosure Action. On August 15, 1991, in an effort to settle the dispute, GE and the Petitioners signed a

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2. The Note and Mortgage was originally between the Petitioners and the Federal Home Loan Mortgage Corporation and made payable to Travelers Mortgage Services, Inc., servicer to the Federal Home Loan Mortgage Corporation. Pursuant to an Assignment of Mortgage dated October 7, 1993, the right, title and interest of the Federal Home Loan Mortgage Corporation in and to the Note and Mortgage were assigned to GE. These facts, as well as many of the other facts set forth in this Opposition, are not addressed either in the Petition or the accompanying Appendices submitted by the Petitioners, although they are contained in the Appendix submitted by GE to the Court of Appeals. (Pet. App. B).

stipulation (the "Stipulation"), which, on December 2, 1991, the Bankruptcy Court reduced to an order. The Stipulation governed all payments due from Petitioners to GE under the Note and Mortgage. It provided that "[i]f Debtor [the Petitioners] should fail to cure the default within ten (10) days, Movant [GE] may file a Certification of Default with the [Bankruptcy] Court and the [Bankruptcy] Court shall enter an Order granting Movant [GE] relief from the Automatic Stay."

The Petitioners defaulted under the Stipulation. GE certified default to the Bankruptcy Court, which entered an order on May 29, 1992 (the "Relief from Stay Order"), granting GE relief from the automatic stay "to proceed with the execution process through, among other remedies, but not limited to, Sheriff's Sale regarding the premises 3 Molly Lane, Chadds Ford, Pennsylvania 19317 and possessory action if necessary".

The Petitioners never appealed the order granting GE relief from the automatic stay. (Pet. App. B).

On June 25, 1992, the Bankruptcy Court entered an order converting the Petitioners' Chapter 11 case to one under Chapter 7 (the "Conversion Order") and granting another one of Petitioners' creditors, TransAmerica Financial Consumer Discount Company ("TransAmerica"), relief from the automatic stay to proceed against certain assets including the Real Property.

On April 13, 1993, the Bankruptcy Court entered an order staying the Conversion Order "pending the determination or other disposition of Debtors [sic] appeal to the United States District Court for the Eastern District of Pennsylvania, Civil Action Nos. 92-4677 and 92-4679" (the "Stay Order"). Nothing in this Stay Order stayed or in any way modified the Relief from Stay Order previously entered by the Bankruptcy Court in favor of GE on May 29, 1992. (Pet. App. B).

GE then proceeded with the Foreclosure Action. On January 28, 1994, the Real Property was sold by the Sheriff of Delaware County, Pennsylvania. GE purchased the Real Property at the Sheriff's Sale. GE's deed to the Real Property, dated May 27, 1994, was duly recorded in Delaware County, Pennsylvania on June 2, 1994. GE remains the record owner of the Real Property.

The Petitioners then filed a motion for contempt (the "Contempt Motion") against GE in Adversary No. 94-2015, an adversary proceeding pending in the Petitioners' bankruptcy case. Although the Stay Order in no way affected GE's rights to foreclose, the Petitioners alleged in the Contempt Motion that GE was in contempt of the Stay Order by proceeding with the Foreclosure Action. By order entered April 19, 1994 (the "Contempt Denial Order"), the Bankruptcy Court denied the Contempt Motion. It is the Contempt Denial Order of April 19, 1994 that is the subject of these proceedings. (Pet. App. B).

The Petitioners appealed the Contempt Denial Order to the District Court, which affirmed. The District Court correctly concluded that on May 29, 1992, the Bankruptcy Court had granted GE relief from the automatic stay to proceed with the Foreclosure Action, that the Petitioners had never appealed that order, and therefore GE had never been in contempt of the Stay Order. (Pet. App. B).

The Petitioners appealed the District Court's affirmance to the Court of Appeals. In that appeal, the Petitioners submitted a defective record, never filing the required Appendix. With the approval of the Court of Appeals, GE submitted an Appendix. By Judgment Order dated January 2, 1996, the Court of Appeals affirmed the District Court. Petitioners' motion for a rehearing was denied. Petitioners' petition for a stay of mandate, pending application for a writ of certiorari, was granted until March 11, 1996. The Petition for a writ of certiorari was filed on March 11, 1996 and docketed on March 26, 1996.

REASONS FOR DENYING THE WRIT

The Petition presents no reviewable issues and there are no adequate reasons for granting the writ. The questions presented in the Petition were not raised below and were not involved in the lower court's decision. No question is presented that involves, or that is alleged to involve, a conflict among the circuits. No important federal question is involved. The decision below does not conflict with a decision of this Court. This case involves only the routine application of uncontroversial principles of bankruptcy law to a residential mortgage foreclosure in the context of the bankruptcy. The case was correctly decided by the courts below, and the petition for a writ of certiorari should be denied.

I.

NO REVIEWABLE QUESTION HAS BEEN PRESENTED.

Petitioners bear the responsibility of framing the questions to be addressed by the Court:

> [a] litigant seeking review in this Court of a claim properly raised in the lower courts thus generally possesses the ability to frame the question to be decided in any way he chooses, without being limited to the manner in which the question was raised below * * * [B]y and large it is the petitioner himself who controls the scope of the question presented. The petitioner can generally frame the question as broadly or as narrowly as he sees fit.

Yee v. City of Escondido, 503 U.S. 519, 535 (1992).

Petitioners present no reviewable question which provides GE or the Court with a clear indication of the grounds on which certiorari is sought. The Petition is incoherent. It sets forth the following "Questions Presented":

> 1. When important federal questions are unanswered by both the United States court of appeals and the state court; do these matters call for an exercise of the United States Supreme Court's supervisory power?
>
> 2. Can a state court decide an important federal question that conflicts with a United States Court of appeals, and can a United States court of appeals depart from the accepted and usual course of judicial proceedings, or sanction such a departure by a lower court?
>
> 3. Can a United States court of appeals loose [sic] jurisdiction over a matter to a lower court?

Petition at p. i.

The Petitioners fail to identify the "important federal questions [which] remain unanswered by both the United States court of appeals and the state court." Moreover, all relevant issues in this case were squarely addressed and considered by the Court of Appeals. No state court orders have ever been at issue.

Petitioners fail to identify any decision by a state court which presents a "federal question that conflicts with a United States court of appeals". No state court order is at issue in this case. Petitioners do not articulate in what manner they contend

that the Court of Appeals departed "from the accepted and usual course of judicial proceedings", or how any such alleged departure by another court was sanctioned by the Court of Appeals when it affirmed the District Court's decision.

Nor is any cognizable issue of "loss of jurisdiction" presented. This case involves an appeal from an order originally entered by the Bankruptcy Court, which Petitioners appealed to the District Court and then to the Court of Appeals.

In their "Statement of the Case", Petitioners include a catalogue of complaints and reasons for further appellate review as follows:

- GE proceeded with lower court actions while Petitioners' various appeals were pending.

- The Court of Appeals ignored unspecified important facts.

- The Court of Appeals should have prepared a detailed memorandum of its decision, instead of disposing of the case by Judgment Order.

- The Bankruptcy Court's "core" proceedings jurisdiction was violated.

- GE did not file a brief with the District Court.

- GE was incorrect in contending that Petitioners failed to serve GE with no

notice of appeal in their appeal to the Court of Appeals.

- Petitioners have a "right of recoupment and set off."

- When the Bankruptcy Court converted the Petitioners' bankruptcy case to one under Chapter 7, GE should have been barred from proceeding with the Foreclosure Action.

- The Court of Appeals' decision is contrary to other unidentified decisions of the Court of Appeals and unspecified decisions of this Court.

- The matter is of "imperative public importance".

None of these points warrants review by this Court.

II.

THE PETITION RAISES QUESTIONS WHICH WERE NOT RAISED BELOW AND WHICH WERE NOT INVOLVED IN THE LOWER COURT'S DECISION.

This Court ordinarily does not decide "questions not raised or involved in the lower court." *Youakim v. Miller*, 425 U.S. 231, 234 (1976). Only in "exceptional cases" coming to this Court from the lower federal courts will questions not pressed or passed upon below be reviewed. *Youakim v. Miller*, 425 U.S. at 234, *citing Duignan v. United States*, 274 U.S. 195, 200 (1927).

Not one of the "Questions Presented" in the Petition was raised below, nor were they involved in the lower court's decision.[3]

None of the decisions below involved or addressed any of the "Questions Presented" in the petition. The courts below correctly held that GE was not in contempt of the Stay Order when it proceeded with the foreclosure sale, because GE had previously been granted specific relief from the automatic stay to take such action.

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3. Petitioners' brief in the Court of Appeals raised only the following issues:

- "The district court should have remanded to the bankruptcy court to develop a record covering the merits of the adversary complaint against Federal Home Loan Mortgage Corporation."
- "The debtors do not misconceive any provision in the bankruptcy rules."
- "Reverse the district court's June 27, 1995, decision and order a hearing on the merits of the adversary complaint proceeding in the bankruptcy court."

Petitioners' Informal Brief to the Court of Appeals at 3-5.

None of these "issues" bears any resemblance to the "Questions Presented" in the Petition, nor could it fairly be argued that they are in any way related or subsidiary to the "Questions Presented". *See generally*, S. Ct. Rule 14.1(a) ("[t]he statement of any question presented will be deemed to comprise every subsidiary question fairly included therein"). Nor have the Petitioners set forth any exceptional circumstances showing why the Court should now address questions which were neither raised below nor involved in the lower court's decision.

III.

THE CASE WAS CORRECTLY DECIDED BELOW.

GE was granted relief from the automatic stay to foreclose on the Petitioners' residence unfettered by any subsequent order of the Bankruptcy Court. The following facts are undisputed:

- On August 15, 1991, GE and the Petitioners signed the Stipulation, which granted GE relief from the automatic stay of 11 U.S.C. § 362(a) upon certification to the Bankruptcy Court that a default by the Petitioners had occurred.

- When the Petitioners defaulted under the Stipulation, GE certified that default to the Bankruptcy Court, and the Bankruptcy Court entered an order on May 29, 1992, granting GE relief from the automatic stay to foreclose on the Petitioners' residence.

- On June 25, 1992, the Bankruptcy Court entered an order converting the Petitioners' Chapter 11 case to one under Chapter 7 and granting TransAmerica relief from the automatic stay to exercise its rights against certain assets, including the Real Property, which order did nothing to modify the Bankruptcy Court's prior order granting GE relief from the automatic stay to foreclose.

- The Petitioners never appealed or otherwise sought to modify the

Bankruptcy Court's Order of May 29, 1992, granting GE relief from the automatic stay to foreclose.

Petitioners did not challenge these facts in the Court of Appeals. They do not challenge them here. These facts suffice to show that the Court of Appeals' decision was correct.

IV.

THE BANKRUPTCY COURT'S DENIAL OF THE PETITIONERS' CONTEMPT MOTION WAS BASED ON ITS CONSTRUCTION OF ITS OWN ORDERS, WHICH CONSTRUCTION IS ENTITLED TO PARTICULAR DEFERENCE.

The Bankruptcy Court construed its own order when it denied the Petitioners' Contempt Motion. The Bankruptcy Court had the power and jurisdiction to do this. In the absence of a compelling showing — which Petitioners have failed to make — the Bankruptcy Court's construction of its own order is entitled to great deference on appeal. *William B. Schnach Development Trust v. Unified Capital Corporation*, 8 F.3d 720, 721-22 (10th Cir. 1993) ("[t]he bankruptcy court surely knows more about the meaning of its own order than we do, and its interpretation of its order . . .is entitled to substantial deference"); *In re Fine Paper Antitrust Litigation*, 695 F.2d 494, 498 (3d Cir. 1982) (appellate court must give particular deference to the district court's interpretation of its own orders).

The District Court and the Court of Appeals gave appropriate effect to this principle in affirming the Bankruptcy Court's denial of the Contempt Motion and the decisions are correct.

V.

NO FURTHER FACTUAL RECORD WAS NECESSARY.

Petitioners apparently contended that there should have been a hearing to determine whether GE violated the automatic stay. However, starting from the Bankruptcy Court's unquestioned construction of its own orders in this matter, no factual record was required to dispose of the Petitioners' misconceived Contempt Motion. The premise of the Petitioners' position is Petitioners' misconstruction of the Bankruptcy Court's order. As the courts below held, that premise was flawed from the beginning. A factual record was unnecessary and would have been a waste of judicial resources. As the District Court and the Court of Appeals correctly concluded, GE had been granted relief from the stay to foreclose on the Real Property and it was not in "contempt" when it proceeded with the Foreclosure Action. No factual hearing was needed.

CONCLUSION

The Petition for Writ of Certiorari should be denied.

Respectfully submitted,

DATED: April 18, 1996

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